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Richard W. Revels, Jr. rwrevels@liskow.com

August 1, 2006

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, LA 70804-4275

Re: Lower Wilcox Zone, Reservoir A

South Bearhead Creek Field Beauregard Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **SWIFT ENERGY OPERATING**, L.L.C. for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Lower Wilcox Zone, Reservoir A, in the South Bearhead Creek Field, Beauregard Parish, Louisiana:

- 1. To dissolve the L WX RA SU previously created by Office of Conservation Order No. 439-B-1, effective April 23, 1991, and simultaneously therewith, to create a revised L WX RA SU for the exploration for and production of oil and gas from the South Bearhead Creek Field, Beauregard Parish, Louisiana.
- 2. To redefine the Lower Wilcox Zone, Reservoir A, as being that oil and gas bearing zone encountered between the depths of 12,470 feet and 14,100 feet (electrical log measurements) in the Swift Energy Operating, L.L.C. Krause and Managan Lumber No. 1 Well, located in Section 32, Township 6 South, Range 11 West, Beauregard Parish, Louisiana.
- 3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed revised reservoirwide unit with each tract sharing in unit production on a surface acreage basis of participation.
- 4. To continue Swift Energy Operating, L.L.C. as unit operator and to grant it permission to designate and utilize its Krause & Managan Lumber Co. No. 1 Well as an additional unit well for the proposed revised reservoirwide unit.
- 5. Except to the extent herein provided, to extend the provisions of Office of Conservation Order No. 439-B-1, as amended and supplemented, and all applicable Statewide Orders to the proposed revised reservoirwide unit.

6. To consider such other matters as may be pertinent.

The Lower Wilcox Zone, Reservoir A, in the South Bearhead Creek Field, Beauregard Parish, Louisiana, was previously defined in Office of Conservation Order No. 439-B-1, effective April 23, 1991, and is hereby redefined as set forth at Item No. 2 above.

Pertinent data, including well logs, may be obtained AT THE COST OF THE REQUESTING PARTY from Mr. Remy Williams of W. H. Robbins & Associates, L.L.C., 302 La Rue France, Lafayette, LA 70508, Telephone Number 337/232-5004.

Pursuant to the Revised Rules of Procedure, a pre-application conference was held on July 6, 2006, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the applicant's proposal. Questions were asked and answered. No counterplans were presented. Several interested parties expressed concern regarding the amount of acreage being added. In response to that concern, the applicant has eliminated approximately seventy acres along the southern boundary of the proposed revised unit in an effort to resolve differences. The unitized interval has also been somewhat expanded. Should any interested party wish to consult regarding the revised proposal, the undersigned should be notified.

Attached hereto and made a part hereof are the following: a revised plat showing the applicant's proposal, the conference attendance list, and the list of the names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom a copy of this application is being furnished. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. The list of parties will be provided to any party requesting a copy. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed is our check in the amount of \$755.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

LISKOW & LEWIS

Bichard W. Revels, Jr.

RWRjr/dbf Enclosures

cc: Mr. Richard Hudson, Lafayette District Office of Conservation cc: Interested Owners, Represented Parties and Interested Parties

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